

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CHAMPPS ENTERTAINMENT, INC.,)	C.A. No. 04-11444 RWZ
Plaintiff,)	
)	
v.)	
)	
AMERICAN INTERNATIONAL GROUP,)	
INC., and NATIONAL UNION FIRE)	
INSURANCE COMPANY OF PITTSBURGH,)	
PA,)	
Defendants.)	
)	

**ASSENTED-TO MOTION OF THE DEFENDANTS, AMERICAN INTERNATIONAL GROUP,
INC. AND NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA., TO
ENLARGE TIME TO RESPOND TO THE COMPLAINT OF THE PLAINTIFF,
CHAMPPS ENTERTAINMENT, INC.**

The defendants, American International Group, Inc. (“AIG”) and National Union Fire Insurance Company of Pittsburgh, PA (“National Union”), respectfully move, **with the assent of the plaintiff**, to enlarge the time by which AIG and National Union must answer, object or otherwise respond to the plaintiff’s Complaint. Specifically, the plaintiff has agreed to extend the time for the Defendants to respond to the plaintiff’s Complaint until ten (10) days following receipt of the ruling by the United States District Court for the Southern District of New York (the “New York Federal Court”) to National Union’s Petition to Compel Arbitration which was filed on August 9, 2004 in the action entitled National Union Fire Insurance Company of Pittsburgh, PA v. Champps Entertainment, Inc., C.A. 04-06163. Oral argument relating to National Union’s Petition to Compel Arbitration was heard by the Honorable Naomi R. Buchwald on August 16, 2004. The parties expect a ruling from the

New York Federal Court on National Union's Petition to Compel Arbitration in the upcoming weeks.

Counsel for the plaintiff assented to this motion by telephone on August 17, 2004.

WHEREFORE, AIG and National Union request that this Court allow this Assented-To Motion and extend the time for AIG and National Union to respond to Champp's Complaint until ten (10) days following receipt of the ruling by the New York Federal Court to National Union's Petition to Compel Arbitration.

The Defendants,

AMERICAN INTERNATIONAL GROUP, INC. and NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA,

The Plaintiff,

CHAMPPS ENTERTAINMENT, INC.,

By their Attorneys,



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By its Attorneys,



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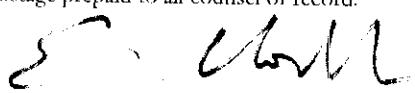
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CERTIFICATE OF Rule 7.1 CONFERENCE AND OF SERVICE

I, Eric M. Chodkowski, hereby certify that, prior to filing the within motion, I conferred with counsel for the plaintiff concerning said motion, who advised that they assent to said motion. I further certify that on this 18th day of August, 2004, I served a copy of the above motion by mailing same, postage prepaid to all counsel of record.



Eric M. Chodkowski